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**VIA EMAIL: [swqs@ecy.wa.gov](mailto:swqs@ecy.wa.gov)**

April 22, 2016

Ms. Becca Conklin  
Water Quality Program  
Washington Department of Ecology

Subject: Comments on proposed revisions to WAC 173-201A Water Quality Standards for Surface Waters.

Dear Ms. Conklin,

KapStone Kraft Paper Corporation (KapStone) appreciates the opportunity to provide comments on the proposed revisions to WAC 173-201A Water Quality Standards for Surface Waters. KapStone's comments are presented below.

KapStone fully supports and endorses the comment package submitted by the Northwest Pulp and Paper Association (NWPAA) and other co-signers, including KapStone.

**WAC 173-201A-460 Intake Credits**

Intake credits are a necessary and appropriate implementation tool for the rule proposal and allowed by the Clean Water Act. KapStone recognizes the improved language in this section over the January 2015 proposal.

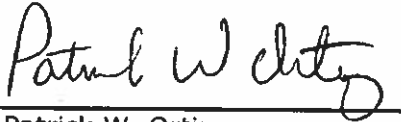
The proposed language provides additional details on the use of intake credits and it states that an intake pollutant must be from the "same body of water" as the discharge in order to be eligible for an intake credit. KapStone interprets interpret the rule language about "same body of water" to be applicable as long as the requirements in WAC 173-201A-460(b) are satisfied.

A literal application of the "same body of water" phrase should be avoided since there could be unique situations, including that at the KapStone Longview mill, where the geography and hydrology of the KapStone water withdrawal and discharge is, in essence, the same water (see description below). As such, KapStone would consider the "same body of water" test to be met if the conditions in WAC 173-201A-460(b) are satisfied.

The old mouth of the Cowlitz is a non-free flowing body of water adjacent to the KapStone Longview mill site on the north side of the Columbia River at river mile 67. This water area is an embayment of the main river and is supplied by tidal ebb and flow from the Columbia River and likely some ground water inflow. KapStone's water intake is located approximately 960 meters inside the inlet mouth. The mill's outfall is in the Columbia River approximately 150 meters downstream of the Old Mouth of the Cowlitz.

It is important to note that this body of water and surrounding drainage area are not considered as part of the Cowlitz River drainage basin by the Department of Interior or the USGS.

Sincerely,

A handwritten signature in black ink, reading "Patrick W. Ortiz". The signature is written in a cursive style with a horizontal line underneath the name.

Patrick W. Ortiz  
Director, Engineering, Environmental and Safety